

# **EXHIBIT 163**

***Grae v. Corporation of America***  
**No. 3:16-cv-2267 (M.D. Tenn.)**  
**Errata to Deposition Transcript of Harley Lappin**  
**Deposition Date: July 28, 2020**

I have read the examination and note the following:

       No changes need to made to the transcript.

  X   Changes listed below.

PAGE:LINE	CHANGE	REASON
18:10	"It is." to "It was."	Transcription error
21:25	"then I reviewed with" to "then I interviewed with"	Transcription error
31:1	"we crowded in more" to "we were overcrowded and in need of additional beds. We"	Transcription error
50:3	"we assessed the – and conducted our own" to "we conducted our own"	Clarify the record
50:5-6	"As we used that document to frame our own after-action," to "We conducted our own after-action through"	To conform to the facts
55:5-6	"I discussed this in detail" to "I discussed the incident in detail"	Clarify the record
55:8	"the outcome of the after-action" to "the outcome of our internal after-action"	Clarify the record
55:21	"afterwards we took this report" to "afterwards we further"	Clarify the record
55:22-23	"that were either not clear to us or were not covered in this report" to "that were not clear to us."	To conform to the facts
57:10-12	"kind of a supplement to this report given the fact that this report didn't cover every aspect of what occurred." to "we conducted our own report to ensure that we covered every aspect of what occurred."	To conform to the facts
75:2	"about efficiencies" to "about deficiencies"	Transcription error
126:12	"about differences" to "about deficiencies"	Transcription error

130:2	"were differences" to "were deficiencies"	Transcription error
134:4	"GO" to "GEO"	Transcription error
142:21	"Spanish-speaking inmates but" to "Spanish-speaking citizens but, in some cases"	To conform to the facts
179:5	"the report" to "the recommendations"	Clarify the record
260:6	"nonpriced" to "Non-Price"	Transcription error
260:13	"nonpriced" to "Non-Price"	Transcription error
261:1	"nonpriced" to "Non-Price"	Transcription error
261:5	"nonpriced" to "Non-Price"	Transcription error
261:14	"nonpriced" to "Non-Price"	Transcription error
275:7	"nonpricing" to "Non-Price"	Transcription error
275:24	"nonpriced" to "Non-Price"	Transcription error
276:19	"nonpriced" to "Non-Price"	Transcription error
277:15	"nonpriced" to "Non-Price"	Transcription error
282:9	"nonpriced" to "Non-Price"	Transcription error

  
WITNESS SIGNATURE

9/11/2020  
DATE